

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Leonard Jones : Chapter 13  
Debtor : Case No. 21—12428-elf**

**OBJECTION TO CONFIRMATION**

The Delaware County Tax Claim Bureau moves that the Debtor's Chapter 13 Plan be denied confirmation pursuant to 11 U.S. C. Section 1322, 1324, and 1325(a)(5), and in support thereof states:

1. The Debtor filed a petition seeking relief under Chapter 13 of the Bankruptcy Code on September 3, 2021.
2. The Delaware County Tax Claim Bureau filed Proof of Claim 1 on October 5, 2021 for the 2019-2020 delinquent real estate taxes due on 816 Church Lane, Lansdowne, Delaware County, Pennsylvania bearing folio number 48-00-00970-00 listed as a secured claim in the amount of \$12,394.44 with an interest rate of 9% on the entire claim. A true and correct copy of the Amended Proof of Claim is attached hereto, made a part hereof and marked as Exhibit "A".
3. The Debtor filed an Amended Chapter 13 Plan on October 21, 2021. A true and correct copy of the Amended Plan is attached hereto, made a part hereof and marked as Exhibit "B".
4. The Amended Chapter 13 Plan fails to pay the Delaware County Tax Claim Bureau's secured Amended Proof of Claim as required by 11 U.S.C. § 1325(a) (5).
5. The Delaware County Tax Claim Bureau objects to the Confirmation of Debtor's Amended Chapter 13 Plan as the Debtor's Plan fails to pay the Proof of Claim in full. 11 U.S.C. § 1324.

6. The Debtor has failed to file an Amended Chapter 13 Plan to pay the Delaware County Tax Claim Bureau's secured Amended Claim in full as required by 11 U.S.C. § 1325(a).

**WHEREFORE**, the Delaware County Tax Claim Bureau respectfully requests this Honorable Court enter an Order denying confirmation of the Debtor's Amended Chapter 13 Plan.

**MICHAEL F. X. GILLIN & ASSOCIATES, P.C.**

**Dated: 10/25/2021**

**BY:** /s/ Stephen V. Bottiglieri  
Stephen V. Bottiglieri, Esquire  
230 N. Monroe Street  
Media, PA 19063  
Phone (610) 565-2211  
Fax (610) 565-1846  
[sbottiglieri@gillinlawoffice.com](mailto:sbottiglieri@gillinlawoffice.com)  
Counsel to Delaware County Tax Claim Bureau